

EXHIBIT 8

**To
PLAINTIFF NICOLE HARRIS'S MOTION TO COMPEL DISCOVERY
RESPONSES FROM THE CITY OF CHICAGO**

November 2, 2015

Case No. 1:14-cv-4391

Margot Klein

From: Stuart Chanen
Sent: Saturday, October 10, 2015 11:53 AM
To: flynnk@gtlaw.com; Fordycet@gtlaw.com
Cc: Margot Klein
Subject: RE: Confirming our call

I inadvertently omitted this sentence as (4). Please treat it as part of the email set forth below:

- (4) We emphasized that time was "of the essence" with respect to these document requests and interrogatories in light of depositions in this case beginning on or about November 6 or 7.

Stuart

Stuart J. Chanen
Valorem Law Group
35 East Wacker Drive, Suite 3000
Chicago, IL 60601
W 312-676-5480
C 847-644-3003
F 312-676-5499
Stuart.Chanen@valoremllaw.com

[f-Card](#) [Firm's Website](#) [Stuart's Bio](#)

From: Stuart Chanen
Sent: Saturday, October 10, 2015 11:50 AM
To: flynnk@gtlaw.com; Fordycet@gtlaw.com
Cc: Margot Klein <Margot.Klein@valoremllaw.com>
Subject: Confirming our call

Tiffany, Kyle,

Thank you taking the time to speak with Margot and me yesterday. This brief email confirms the following:

- (1) Consistent with your recent letter, you will be supplementing on Monday, October 12,
 - a. Your Response to Interrogatory Nos. 1, 2, and 3.
 - b. your Response to Document Requests 6, 7, and 8 by supplying bates numbers for each category and subcategory of documents requested. If you have no documents with respect to a category or subcategory, you will so indicate.
- (2) Consistent with your letter and our more detailed conversation yesterday, you will be supplementing on or before, Friday, October 16,
 - a. Your Response to Interrogatory Nos. 4-7 to the extent that you obtain such information from your client.
 - b. Your Response to Document Requests 1-5 to the extent that you obtain such documents from your client AND to the extent that we reach agreement on the time frame applicable to our requests related to the CPD Polygraph Unit. As we discussed during our meet and confer, we believe that the time frame of 2000 to 2015 is reasonable, but to address your concern about the time frame of

2000 to the "present," and specifically to the notion that constitutes an indefinite time, we are willing to alter the request to documents from 2000 to the date of the request. We further indicated that if we can reach agreement on this proposed compromise, we would immediately move to Court to compel all analyses, reviews, evaluations, or assessments that have been written with respect to CPD's polygraph unit during this time frame.

- (3) We have agreed to continue our "meet and confer" on Friday, October 16, at 1:30 p.m. with the same dial-in: 312-676-5495, then 5484#.

If this email does not accurately summarize our discussions, please contact me immediately.

We look forward to getting these issues resolved promptly and to receiving your supplemental responses/productions this coming week.

If any question or need for clarification arises this coming week, do not hesitate to contact Margot or me.

Sincerely,
Stuart Chanen

cc: Margot Klein

Stuart J. Chanen
Valorem Law Group
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Chicago, IL 60601
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F 312-676-5499
Stuart.Chanen@valoremlaw.com

[V-Card](#) [Firm's Website](#) [Stuart's Bio](#)